

25 May 2011

Senior Technical Manager
Compliance Program
545 Fifth Avenue, 14th Floor
New York, New York 10017 USA

Dear Sir or Madam

Proposed IFAC Member Body Compliance Program Strategy 2011 - 2014

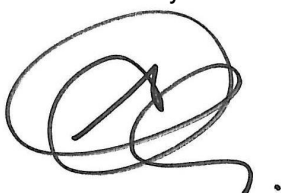
Thank you for the opportunity to comment on the Proposed IFAC Member Body Compliance Program Strategy 2011 - 2014. CPA Australia, the Institute of Chartered Accountants in Australia (the Institute) and the National Institute of Accountants (the Joint Accounting Bodies) have considered this proposed revision and our comments follow.

The Joint Accounting Bodies represent over 180,000 professional accountants in Australia. Our members work in diverse roles across public practice, commerce, industry, government and academia throughout Australia and internationally.

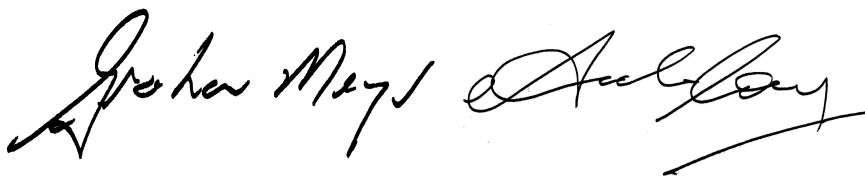
The Joint Accounting Bodies recognise the central importance of the role that the Compliance Program and Compliance Advisory Panel (CAP) serve to safeguard and continuously improve the quality of the accountancy organisations in IFAC. In our view the strategy and work plan presented in the consultation paper are highly appropriate to achieving the program's stated goals. We noted that discussion of a risk based approach to compliance activities including action plan updates, timelines and other processes took place at the CAP meeting in April 2011. The Joint Accounting Bodies would encourage a system with a clear basis for classifying member bodies according to compliance risk. We support the inclusion of this approach in the proposed Strategy, with the strategy clearly defining the action required as a function of risk classification. We consider that this would serve the efficiency and focus of compliance activities.

The Joint Accounting Bodies are committed to assisting in the development and implementation of the highest quality standards. If you have any questions regarding this submission, please do not hesitate to contact Amir Ghandar (CPA Australia) at amir.ghandar@cpaaustralia.com.au, Paul Meredith (Institute) at paul.meredith@charteredaccountants.com.au, or Tom Ravlic (NIA) at tom.ravlic@nia.org.au.

Yours sincerely



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